

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	
	*	
NASHALIE IVETTE RODRIGUEZ GARCIA	*	CASE NO. 14-09549 MCF
	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR'S REPLY TO *MOTION TO DISMISS UNDER 11 U.S.C. 1307(c)(4)*  
*FOR FAILURE TO MAKE POST-PETITION PAYMENTS*  
*TO THE CAR LOAN UNDER CONFIRMED PLAN*  
DOCKET NO. 20**

TO THE HONORABLE COURT:

COMES NOW, **NAHSALIE IVETTE RODRIGUEZ GARCIA**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Cooperativa A/C Valenciano ("Coop") a *Motion to Dismiss Under 11 U.S.C. 1307(c)(4) for Failure to Make Post Petition Payments to the Car Loan Under the Confirmed Plan*, stating that the debtor "... is in post-petition arrears for thirteen (13) months in the amount of \$5,459.48 dollars." *Motion to Dismiss ...*, paragraph 4, docket no. 20.

2. The debtor hereby respectfully replies to Coop's request for dismissal stating that on this same date, May 09, 2016 the debtor has filed a request to convert the above captioned Chapter 13 case to one under Chapter 7, docket no. 21.

3. Therefore, the debtor respectfully hereby replies to Coop's motion for dismissal stating that upon the approval of debtor's request for conversion, the request for dismissal becomes "moot".

Page – 2-  
Debtor's Reply to Motion to Dismiss  
Case no. 14-09549 MCF13

**WHEREFORE**, the debtor respectfully requests this Honorable Court grant debtor's motion in reply to the Coop's motion for dismissal, docket entry #20, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; Luis Fred Salgado, Esq. Counsel for Coop A/C Valenciano; I also certify that a copy of this motion was sent via US Mail to the debtor: Nashalie Ivette Rodriguez Garcia, POI Box 434 Gurabo PR 00778.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 09<sup>th</sup> day of May, 2016.

*/s/ Roberto Figueroa Carrasquillo*  
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